IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent Application of	**MAIL STOP AF**
Masatoshi Takaira et al.	Group Art Unit: 2625
Application No.: 09/735,488	Examiner: THOMAS J. LETT
Filed: December 14, 2000	Confirmation No.: 8369
For: DIGITAL COPYING MACHINE AND IMAGE DATA TRANSFER METHOD IN DIGITAL COPYING MACHINE	

REQUEST FOR A PRE-APPEAL BRIEF CONFERENCE

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

Claims 1-5, 7-16, 17, 19 and 20 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Nagashima* in view of *Ambalavanar*.

Internal Bus:

Claim 1 includes an internal bus that transmits the scan image data generated by an image reader to the controller and that transmits the print image data from the controller to the printing unit. The Examiner alleges that the line illustrated in Nagashima Fig. 4 interconnecting the external controller 34 and the color copying apparatus 35 allegedly corresponds to the claimed internal bus. However, the line in *Nagashima* is not an internal bus. The *Nagashima* line connects an external controller 34 to the color copying apparatus 35. Accordingly, the line illustrated in Fig. 4 is an external line, not an internal bus.

In contrast to *Nagashima*, in a preferred embodiment of the present invention, the bus 40 is internal to the digital copying machine 10, as illustrated in Fig. 1. However, the present invention is not limited to the disclosed embodiments.

Accordingly, *Nagashima* does not teach or suggest an internal bus, as set forth in claim 1.

Controller:

The Examiner acknowledges that *Nagashima* does not teach or suggest the claimed controller. The Examiner relies upon *Ambalavanar* to overcome that deficiency. The Examiner appears to be relying upon the controller 16 of *Ambalavanar* to allegedly correspond to the claimed controller. However, the claimed controller is defined as a controller through which the scan image data and the print image data are exchanged with an external computer. In *Ambalavanar*, the controller 16 is used to control the flow of data between the scanner 18 and the printer 20. Although the controller 16 interfaces with a network service module 14, there is no teaching or disclosure in *Ambalavanar* that image data is exchanged with the network service module 14. Accordingly, *Ambalavanar* does not teach or suggest a controller through which scan image data and print image data are exchanged with an external controller.

Switch:

The Examiner acknowledges that *Nagashima* does not teach or suggest a switch that, in response to a signal, switches the internal bus between transmission from the image reader to the controller and transmission from the controller to the printing unit. To overcome this deficiency, the Examiner also relies upon *Ambalavanar*. However, the Examiner fails to identify which element in *Ambalavanar* corresponds to the claimed switch, or how *Ambalavanar* would teach or suggest modifying *Nagashima* to include the claimed switch. In *Ambalavanar*,

there are separate buses interconnecting the controller to the scanner 18 and the printer 20. *See* paragraph 2 on page 2 of the latest Office Action dated June 2, 2008. Since the controller 16 uses separate buses for interconnecting with the scanner 18 and the printer 20, there would be no reason that one would include a switch for switching an internal bus between transmission from the image reader to the controller and transmission from the controller to the printing unit. There simply would be no need for such a switch in *Nagashima*. Furthermore, it is not clear how *Nagashima* could be modified to include such a switch.

Signal Generator:

Furthermore, the claimed switch responds to a signal that is generated by a signal generator that is based on an operation timing of the printing unit. With regard to the signal, the Examiner explains in paragraph 5 bridging pages 2 and 3 of the last Office Action, that *Nagashima* includes an image clock that generates a clock signal. However, the Examiner does not explain how a signal from the image clock of *Nagashima* would be used to control a switch (which the Examiner also has not yet identified).

Accordingly, claim 1 is clearly patentable over the prior art applied by the Examiner.

Claim 7:

Claim 7 defines a method which has been rejected for the same reason as that of claim 1. Accordingly, Applicants allege that claim 7 is also patentable over the applied prior art at least for the same reasons set forth above with respect to claim 1.

Claim 12:

The Examiner alleges that claim 12 is a method claim which is rejected for the same reason as that of claim 1. However, claim 12 is not a method claim, it is an apparatus claim defining a controller. The controller of claim 12 includes an internal bus and a switch that responds to a signal. However, as explained above with respect to claim 1, the applied prior art does not disclose the internal bus, the switch, nor a relevant signal. Accordingly, claim 12 is also patentable over the applied prior art.

Dependent Claims:

The remaining dependent claims are patentable over the applied prior art at least for the reasons set forth above with respect to the independent claims from which they depend. Accordingly, the Examiner is respectfully requested to reconsider and withdraw the outstanding rejections.

Respectfully submitted,

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